



An Oshkosh Corporation Company

Iowa Mold Tooling Company, Inc.
500 Highway 18 W, P.O. Box 189, Garner, IA 50438
Phone: 641-923-3711 Fax: 641-923-6063

RECEIVED
JUN 12 2017
AWMD/WEMM

Certified Return Receipt Requested

May 26, 2017

Mr. Gary R. Witkovski
U.S. EPA Region 7
Federal Building
210 Walnut Street, Room 473
Des Moines, IA 50309-2109

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**RE: Response Letter to Notice of Preliminary Findings, EPA Hazardous Waste Inspection
Iowa Mold Tooling Company, Inc., Garner, IA Facility
EPA ID # IAD005286539**

Dear Mr. Witkovski:

This letter is written on behalf of Iowa Mold Tooling Company, Inc. (IMT) in response to the RCRA Compliance Evaluation conducted by Mr. John D. Dixon on May 18 and 19, 2017 at the IMT facility. This letter serves as a response to the six items identified in the Notice of Preliminary Findings Report (Attachment 1). The numbering below corresponds with the numbered items within the report. The six items listed were either addressed at the time of the inspection or corrective actions were promptly implemented and the follow-up information is within this response.

Item 1. Failed to conduct weekly inspections at a hazardous waste container accumulation area; 40CFR 262.34(a)(1)(i) - 265.174:

Finding:

A full drum of waste was outside the satellite collection point area waiting for materials pick-up for transport to the 90 day storage area and was there beyond 3 days.

Corrective Action:

The full container was promptly moved to the 90 day storage area which was verified by the inspector. The weekly Layered Process Audit (LPA) was updated to include the inspection of this area which would verify that no full drums are remaining beyond the 3 days. Facility personnel were retrained on the requirement and documentation of the updated portion of the LPA as well as new signage photos can be found in Attachment 2.

Item 2. Failed to include hazardous waste related duties in written job descriptions for personnel who manage hazardous waste; 40CFR 262.34(a)(4) - 265.16(d)(2):

Finding:

The requirement was not listed in the job description(s).

RCRA



566258

Corrective Action:

The requirement was added to all applicable job descriptions and several examples can be found in Attachment 3.

Item 3. Failed to have a written description of the type and amount of introductory and continuing training for personnel who manage hazardous waste; 40CFR 262.34(a)(4) - 265.16(d)(3):

Finding:

The requirement was not listed in the job description(s).

Corrective Action:

The requirement was added to all applicable job descriptions and several examples also can be found in Attachment 3.

Item 4. Failed to provide hazardous waste training for all personnel who manage hazardous waste; 40CFR 262.34(a)(4) - 265.16:

Findings:

Training records were available for all employees with hazardous waste duties with the exception of one employee. The employee who signed the manifest was the manager of the team normally responsible for shipping the waste, however he had not been trained for the current year but was trained in previous years.

Corrective Action:

The employee was re-trained, as well as other employees, on hazardous waste handling and shipping requirements and a training list was developed to document and determine if anyone has missed the training. Documentation of this training can be found in Attachment 4.

Item 5. Failed to include evacuation routes and alternate evacuation routes in the Contingency Plan; 40CFR 262.34(a)(4) - 265.52(f):

Finding:

Evacuation routes were not included within the Contingency Plan. These routes are available in the facility Emergency Response Plan (ERP) which is the main emergency response document referenced in the event of an emergency.

Corrective Action:

The Contingency Plan was updated to include an evacuation route map and the updated plan will be re-distributed to the local emergency response agencies. Facility personnel were already trained on the evacuation routes as part of the ERP and route signs are available on exit doors. The updated plan can be found in Attachment 5.

Item 6. Failure to make an adequate hazardous waste determination on Waste Multispec; 40CFR 262.11:

Finding:

The current profile for Waste Multispec did not carry the D035, F003 and F005 waste codes pertaining to the solvent content within the waste. The waste has always been managed correctly as a hazardous waste.

Corrective Action:

The profile was updated to reflect the D035, F003 and F005 waste codes. Documentation of this can be found as Attachment 6. All labeling was updated to reflect the new codes.

On behalf of IMT we appreciate the time you spent thoroughly evaluating the RCRA compliance status of our Garner, IA facility. The facility takes compliance seriously and we feel that the follow-up actions will sustain the above mentioned requirements and meets your approval and will be satisfactory to close-out the inspection.

Please feel free to contact me at (507) 374-8744 if there are any questions regarding these corrective actions.

Sincerely,



Matthew Gregory
Sr. Environmental Manager
Commercial Segment, Oshkosh Corporation

Encls:

cc: Jim Hasty, IMT
Jim Homann, IMT

Visit us at our website: www.imt.com

ATTACHMENT 1

Notice of Preliminary Findings Report

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Towne Mold Tooling Company, Inc.
 ADDRESS: 500 Hwy 18 W
Gurnee, IL 60438
 EPA ID NUMBER: IA0005286539 DATE: 05/19/2017

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failed to conduct weekly inspections at a hazardous waste container accumulation area 40 CFR 262.34(a)(1)(i) → 265.174
2. Failed to include hazardous waste-related duties in written job descriptions for personnel who manage hazardous waste 40 CFR 262.34(a)(4) → 265.16(d)(2)
3. Failed to have written description of type + amount of introductory and continuing training for personnel who manage hazardous waste 40 CFR 262.34(a)(4) → 265.16(d)(3)
4. Failed to provide hazardous waste training for all personnel who manage hazardous waste 40 CFR 262.34(a)(4) → 265.16
5. Failed to include Evacuation routes + alternate evacuation routes in the Contingency Plan 40 CFR 262.34(a)(4) → 265.52 (F)
6. Failed to make an adequate hazardous waste determination on waste Multispec 40 CFR 262.11
- 7.

If you have any questions regarding these findings please contact Mr. Gary Witkowski, USEPA

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Jim Hasty TITLE: VP/IGM

SIGNATURE: [Signature]

This document was prepared by John D. Dixon / [Signature]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
Iowa Mold Tooling Company, Inc.
Facility Address
500 Hwy 14 W, Gurnee, IA 50438

Documents Collected? YES ☒ (list below) NO ☐

Samples Collected? YES ☐ (list below) NO ☒ Split Samples: YES ☐ NO ☐



Documents/Samples were: 1) Received no charge ☒ 2) Borrowed ☐ 3) Purchased ☐

Amount Paid: \$ Method: Cash ☐ Voucher ☐ To Be Billed ☐

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1. Manifests for Rineco shipments ^{Dated 4/19/16, 7/26/16, 11/30/16, & 4/27/17 (LDRs for last 2)} (18 pages)
2. Manifests + LDRs for Hydrite HSM shipments dated 4/28/17 & 5/12/17 (7 pages)
3. Contingency Plan (16 pages)
4. Job descriptions for Painter A & Painter B (3 pages)
5. 2017 weekly hazardous waste inspection log (1 page)
6. Blank LPA page showing Multispec container @ West Point is inspected weekly (1 page)
7. LPA pages showing Hazardous Waste Room audits from 12/2/16 and 1/6/17 (1 page)
8. Nonhazardous waste TCLP metals analytical report dated 10/13/15 (21 pages)
9. Facility Map (1 page)
10. Job Description For Maintenance Janitor (1 page)

Facility Representative (print)	Signature/Date
Jim Hasty	 5/19/17
Inspector (print)	Signature/Date
John D. Dixon	 05/14/2017
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name <i>Iowa Mold Tooling Company, Inc.</i>	
Facility Address <i>500 Hwy 18W, Garner, IA 50438</i>	
Inspector (print) <i>John D. Dixon</i>	
U.S. EPA, Region 7, 11201 Renner Blvd., Lenexa, KS 66219 <i>JDD</i>	Date <i>5/19/2017</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) <i>Jim Hasty</i>	Signature/Date <i>[Signature]</i> <i>5/19/17</i>

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

ATTACHMENT 2

LPA Update and New Standard Work Signs

Area is free of waste drums?

Waste limited to 24 hrs.

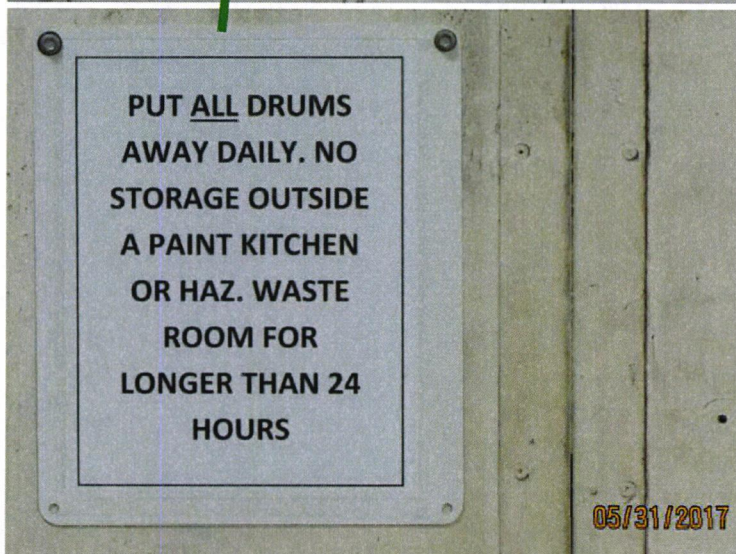
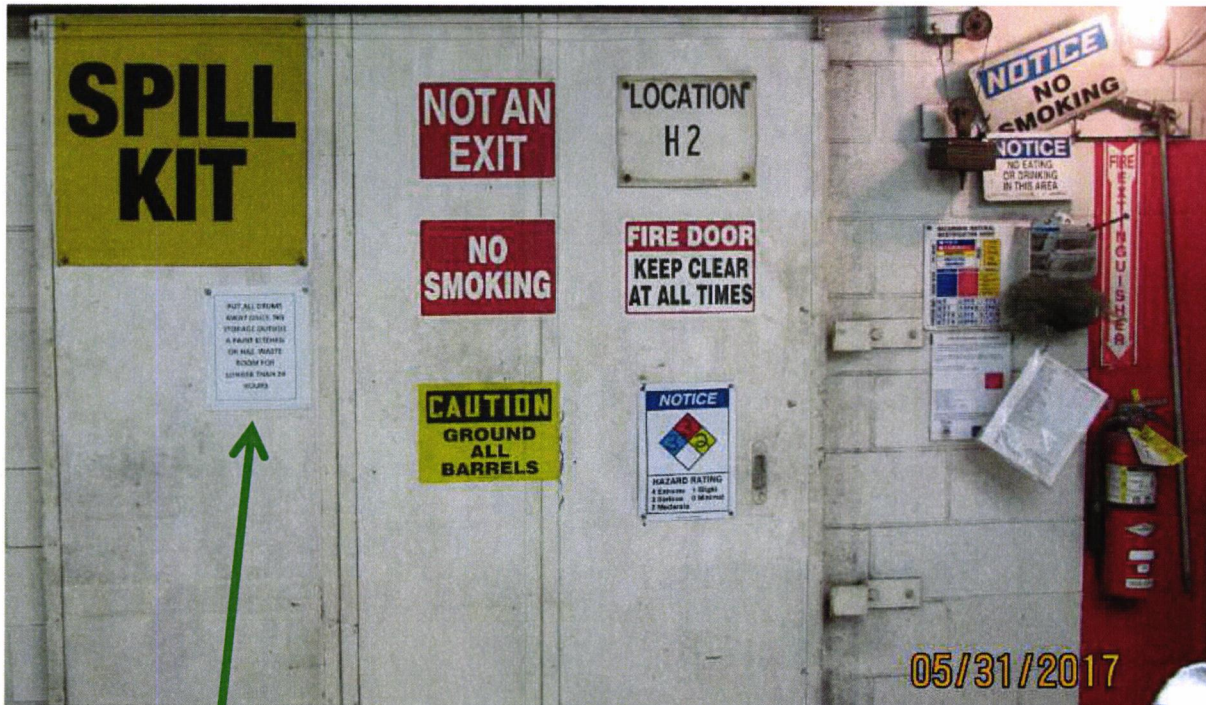
Raw Material = 1 days worth.

☐ Yes

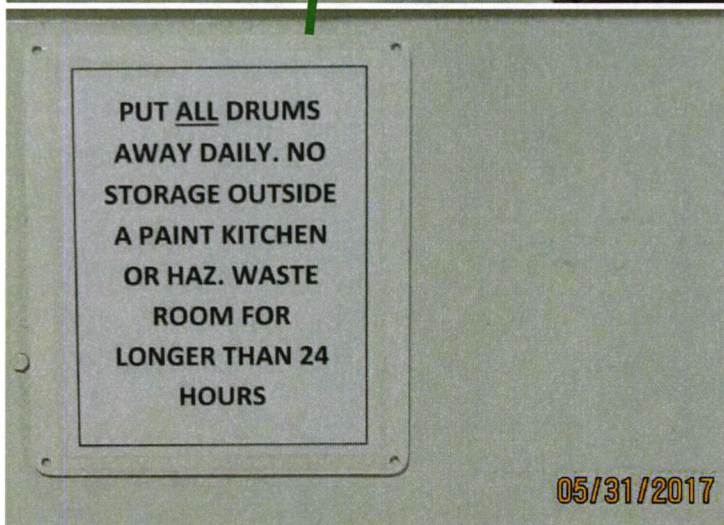
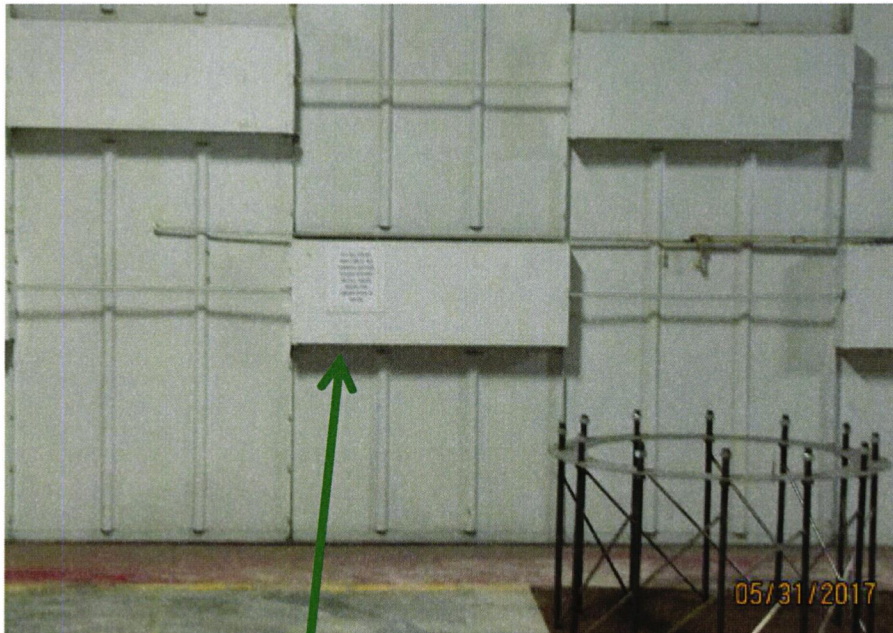
☐ No



Increased awareness signage at the east paint kitchen. – IMT 5/31/17



Increased awareness signage at the east paint kitchen. – IMT 5/31/17



ATTACHMENT 3

Job Descriptions Update

IOWA MOLD TOOLING

JOB DESCRIPTION

HRIS Job Title: IM0607
Market Title: Lead – PAINTER A
FLSA Status: Non-Exempt
Pay Grade: IM2
Prepared Date: 10/27/08
Revision Date: 5/31/2017
Updated By: Dawn Gamerdinger

LEAD – Painter A

SUMMARY

The major responsibility of this job is performing painting related duties in a manufacturing environment.

ESSENTIAL DUTIES AND RESPONSIBILITIES

1. Prime, paint, and touchup vehicles with power spray equipment and brushes.
2. Mask, unmask, or adjust masking as necessary to ensure specifications are met.
3. Sand, wash, and condition parts as necessary. Light bodywork may be required.
4. Disassemble, clean, repair, adjust and reassemble painting equipment, such as pumps, paint heaters, tanks, spray guns, etc. for proper operation.
5. Flush tanks, hoses and guns prior to color changeovers.
6. Mix all types of paints for proper color, formula, conditions, viscosity and consistency.
7. Perform titrations and mix or adjust chemicals as necessary in paint, zinc, or other processes.
8. Apply decals, stencils, and rustproofing as required.
9. Upkeep of work area and equipment which may include preventative maintenance tasks.
10. Inspect product before, during, after paint process to ensure specifications are being met.
11. Transport, move or guide parts, subassemblies, or assemblies before, during, or after paint process and to next operation. This may include moving racks or carts by hand and the use of material handling equipment such as a fork lift or overhead crane.
12. Other duties as assigned or required.

REQUIRED TRAINING

- Per 40 CFR 265.16(d)(1-3) – This position requires initial training within 6 months and annual thereafter as a hazardous waste handler and or emergency coordinator as required by the EPA RCRA hazardous waste rules.
- Responsible for the overall management of hazardous waste regulations and training for the facility which includes, but is not limited to, waste hazards, storage time limits, satellite accumulation, marking, labeling, weekly inspections, aisle space, storage, manifest shipping, use and location of emergency equipment, response to spills and fires, evacuation, etc.

BASIC QUALIFICATIONS

Minimum of 1-year experience in the painting of automotive or heavy vehicle/equipment in a manufacturing, industrial, or automotive body shop. Strong mathematical skills. Basic mechanical aptitude.

Must be at the skilled level in 7 areas of the matrix and must also be at an intermediate level in 7 areas of the matrix.

IOWA MOLD TOOLING

JOB DESCRIPTION

HRIS Job Title: IM0610
Market Title: Parts Handler A - Lead
FLSA Status: Non-Exempt
Pay Grade: 2
Prepared Date: 10/27/2008
Revision Date: 5/31/2017
Updated By: Dawn Gamerdinger

SUMMARY

Individual will be mainly responsible for maneuvering bodies, chassis', cranes and other material handling equipment in a shipping/receiving capacity. He/she will also need to learn and utilize the current computer system, reading and understand bill of lading for both shipping and receiving purposes.

ESSENTIAL DUTIES AND RESPONSIBILITIES

1. Maintain inventory levels by identifying, labeling, stocking and recording materials and supplies
2. Transport heavy material including but not limited to cranes and ship out bodies using a forklift both inside and outside of buildings
3. Transport chassis within the IMT grounds
4. Determine shipping requirements by customer order
5. Verify items and quantities on packing slips and receive or ship as necessary
6. Package materials and parts in various containers for safe shipment to internal and external customers.
7. Communicate with internal customers while responding to support requests
8. Develop bills of lading (loading) and delivery forms
9. Locate materials and supplies by pulling and verifying materials and supplies listed on bill of lading
10. Loading/Unloading of 10,000+lb cranes with the yard crane from containers
11. Cycle count inventory as requested by supervisor
12. Other duties as assigned

REQUIRED TRAINING

- Per 40 CFR 265.16(d)(1-3) - This position may require initial training within 6 months and annual thereafter as a hazardous waste handler as required by the EPA RCRA hazardous waste rules.
- Responsible for and trained to understand waste hazards, storage time limits, satellite accumulation, marking, labeling, weekly inspections, aisle space, storage, manifest shipping, use and location of emergency equipment, response to spills and fires, evacuation routes, etc.

BASIC QUALIFICATIONS

High School Diploma required.

Basic computer knowledge and ability to obtain a forklift and crane license within 30 days

PREFERRED QUALIFICATIONS

Crane License and 6 months' experience in a manufacturing industry preferred.

ATTACHMENT 4

Training Documentation

IOWA MOLD TOOLING CO. INC.

SUBJECT:	Haz. Waste Mat'l Hndlr Training	DATE:	May 26 / May 30, 2017
Supervisor:	Nick Studer	Instructor	Jim Homann

NAME		Team Member #	Dept	SIGNATURE:
1	Robert Dodd	260218	MAINT	Robert Dodd
2	David Hansen	262165	Supr	DMH
3	Rustin Platsch	262218	O&O	Rustin Platsch
4	Gary Blakesley	2621362	Maint	Gary Blakesley
5	Koss Kuester	214170	WPaint	Koss Kuester
6	Ed White	262467	EPaint	Ed White
7	Ben Ebeling	119500	Maint	Ben Ebeling
8	Matthew Darling	262238	Maint.	Matthew Darling
9	Lorna Patterson	199206	WPaint	Lorna Patterson
10	Steve Wood	260714	EPaint	Steve Wood
11	Leo Wold	260423	Maint	Leo Wold
12	Dennis Negrete	260479	CLARK/BA	Dennis Negrete
13	Rachel Scheneman	1890106	WPaint	Rachel Scheneman
14	Kyle Sanchez	721916	EPaint	Kyle Sanchez
15	David A Galindo	221264	WPaint	David A Galindo
16	JIM MARCINIAR	962736	MAINT	Jim Marciniar
17	MARIA D. LEIHUGA	262869	E. Paint	Maria D. Leihuga
18	Jacob Miller	170151	W. Paint	Jacob Miller
19	Ricky Lance	186075	EPaint	Ricky Lance
20	Laura Best	260707	EPaint	Laura Best
21	SHAWN GONNEMAN	188029	WPAINT	Shawn Gonnerman
22	Jonathan Jindin	225051	WPaint	Jonathan Jindin
23	Harold Stinnett	262394	Maint.	Harold Stinnett
24	VANCE HANSEN	262445	Maint.	Vance W. Hansen
25	Tyavis Johnson	261806	W. Paint	Tyavis Johnson
26	Jon Lawton	223394	W Paint	Jon Lawton
27	Mike Springer	237945	WPaint	Mike Springer
28	Steve Nicholson	186632	WPAINTS	Steve Nicholson
29	Brian Schroeder	149793	WPaint	Brian Schroeder
30	Kelli Finnegan-Smith	202152	WPaint	Kelli Finnegan-Smith
31				

IOWA MOLD TOOLING CO. INC.

SUBJECT:	Haz. Waste Mat'l Hndlr Trng	DATE:	6/1/2017
Supervisor:	Various	Instructor	Jim Homann

NAME		Team Member #	Dept	SIGNATURE:
1	Derrick Climer	234725	West Parts	Derrick Climer
2	Bob Miller	199195	West Parts	Bob Miller
3	Josh Zergin	238406	Maint.	Josh Zergin
4	Rodney Graft	262833	Body assem.	Rodney Graft
5	Shane Schuwer	199196	W. Paint	Shane Schuwer
6	Sylvia Hayworth	261853	W. Paint	Sylvia Hayworth
7	Jack Grimmer	212404	W. Paint	Jack Grimmer
8	John Gansveld	149243	EP	John Gansveld
9	Nichole Aemunn	222948	E. Paint	Nichole Aemunn
10	Tracy Astarr	261377	100	Tracy Astarr
11	Bert Cassels	260600	100	Bert Cassels
12	Darby Ames	262142	W. Parts	Darby Ames
13	Randy Fisher	261932	W. Parts	Randy J. Fisher
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ATTACHMENT 5

Hazardous Waste Contingency Plan - Updated



An Oshkosh Corporation Company

Iowa Mold Tooling Co., Inc.

500 Highway 18 West • P.O. Box 189 • Garner, IA 50438-0189 • P: (641) 923-3711 • F: (641) 923-6063

HAZARDOUS WASTE CONTINGENCY PLAN AND EMERGENCY PROCEDURES

EPA Title 40 CFR Part 265 Subpart D - Hazardous Waste Rules

**Iowa Mold Tooling Co., INC.
500 Highway 18 West
Garner, IA 50438
EPA ID No. IAD005286539**

May 2017 Revision



An Oshkosh Corporation Company

Iowa Mold Tooling Co., Inc.

500 Highway 18 West • P.O. Box 189 • Garner, IA 50438-0189 • P: (641) 923-3711 • F: (641) 923-6063

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An Oshkosh Corporation Company

Iowa Mold Tooling Co., Inc.

500 Highway 18 West • P.O. Box 189 • Garner, IA 50438-0189 • P: (641) 923-3711 • F: (641) 923-6063

Facility Information: 40 CFR 112.20 (h)(2)

Street Address: 500 Highway 18 West
Garner, IA 50438
Mailing Address: P.O. Box 189
Garner, IA 50438
Phone: 641-923-3711
Fax: 641-923-6063
Latitude: 43.107444°N
Longitude: -93.608549°W

Facility Description: 40 CFR 112.20 (h)(2)

The Facility is located at 500 Highway 18 West in the southeast $\frac{1}{4}$ of the northwest $\frac{1}{4}$ of Section 30, Township 69 North, Range 23 West, Garner, Hancock County, Iowa. The Facility is bordered by Highway 18 West to the south, industrial yard to the east, and undeveloped/agricultural land to the north and west. All copied from SPCC Plan.

IMT converts truck chassis into work/service vehicles. The facility has been in operations since 1961 and is currently running for 21 hours a day. Operations on their facility consist of cutting, welding, assembly, and painting. As part of their manufacturing operations, IMT utilizes and stores various oils and fuels including used oil, hydraulic oil, gasoline and diesel fuel. Oil and fuel on Site is used by maintenance, hydraulic machines, hydraulic testing, and assembly of hydraulic parts.

Facility Permits and Identification Numbers:

Air Permit: 92-A-503-S6
Stormwater: IA-0644-0499
EPA Identification No.: IAD005286539
Dun No.: 005286539
SIC Code: 3713
NAICS Code: 336211
TRI Facility ID No.: 50438WNLET500HW



An Oshkosh Corporation Company

Iowa Mold Tooling Co., Inc.

500 Highway 18 West • P.O. Box 189 • Garner, IA 50438-0189 • P: (641) 923-3711 • F: (641) 923-6063

Applicability and Purpose: 40 CFR 265.50: (a–b)

- (a) The purpose of this plan is to minimize the hazards to human health and the environment. This plan explains the actions and responsibilities IMT personnel must take in the event of a fire, explosion, or release of hazardous materials.
- (b) This plan must be carried out immediately in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, or the surface water at the facility.

Implementation of Plan: 40 CFR 265.51

The provisions of the plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment. This plan does not specifically address fires or explosions. Those emergency situations are addressed in the corporate Emergency Response Plan (ERP) which is developed and implemented by the Corporate Safety Department.

See Emergency Response Plan (ERP) for evacuation maps, fire extinguisher maps, spill kit maps and eye wash station maps.

Local Emergency Response Agencies:

Garner Police Department
Hancock County Sheriff Department
Garner Volunteer Fire Department
Garner Volunteer Ambulance Service

Emergency Agency Response Agreement: 40 CFR 265.52

Unexpected Release:

The hazardous waste generated at IMT and held in the Hazardous Materials Storage room, consists of waste paint and some solvents/paint thinner and towels containing solvents and paint thinner. These materials, should they be unexpectedly released, will present little hazard to people or property. In this case the emergency agencies may not be required to be involved. The coordinator when making the initial assessment will determine this. Trained IMT personnel would handle cleanup of these materials.

If the material would be released in the hazardous materials storage room, it would be contained in that room and cleanup would be easy to accomplish.



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Iowa Mold Tooling Co., Inc.

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If the material was released within the building every effort would have to be made to eliminate a heat or fire source and cleanup could begin by using the spill kits that are available next to the paint kitchens and the hazardous materials storage room. Salvage drums are also located next to the hazardous materials storage room.

Fire or Explosion:

Should a fire involve the hazardous waste in the hazardous materials storage room, a call would have to be made to the Garner Communications Center and a request for the fire department would be made. The hazardous materials storage building does not have fire suppression equipment but does have smoke detectors linked to the facility alarm box.

If a fire occurred within the facility an alarm would be set off by an activation of the sprinkler system and by calling the communications center. (911)

The Garner Police Department and the Hancock County Sheriff Department would monitor the call for emergency agency assistance.

If there were personal injuries or the potential for injury because of the nature of the emergency, the local volunteer ambulance service would be summoned by calling the communications center. (911)

IMT has no fire brigade. Team members are trained in the proper use of fire extinguishers, but are not required to fight a fire. They are instructed to use a fire extinguisher only if they believe they can control the fire. If they are not comfortable confronting the fire, they are to leave the area, report the fire to a member of management and exit the building.

Arrangements:

The Garner Police Department, The Hancock County Sheriff Department, The Garner Volunteer Fire Department and the Garner Ambulance Service will all respond to an emergency at IMT, if summoned. Should there be a hazardous waste spill or fire and there is a need for traffic control, the need to direct team members or warn surrounding businesses, the Police and Sheriff's Department will respond if called. The fire Department will respond if there is a need to fight or monitor the fire. The Ambulance Service will be called if there is a possibility of personal injury. They will coordinate triage, treatment and transportation. These agencies will respond to the scene if called to assist in any way that they safely can.

The hazardous materials generated and stored at IMT would not require the assistance of a haz. mat. team should there be an emergency.



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The above-mentioned agencies have been contacted and have toured the facility and have a copy of this Contingency Plan and the Emergency Response Plan.

Outside contractors will not be used during an emergency.

The Garner Volunteer Ambulance Service will coordinate procedures with the local hospitals.

Emergency Coordinator: 40 CFR 265.55

At all times there must be at least one team member either on the site premises or on call who is available to respond to an emergency within a short period of time. This person must be thoroughly familiar with all aspects of the contingency plan, all operations of the site, know the location of all records, the site layout, and must have the authority to commit the resources needed to carry out the contingency plan. The emergency coordinator or his/her alternate is available 24 hours a day, 7 days a week. This individual will interface with the police and fire departments, local and national regulatory agencies as well as other emergency response organizations. This person will be able to assess possible hazards to human health and the environment and implement prompt removal actions to contain and remove the substance released, coordinate rescue and response actions as previously arranged with all response personnel, use authority to immediately access company funding to initiate cleanup activities, and direct cleanup activities until properly relieved of this responsibility.

Emergency Coordinator Contact List:

Primary Emergency Coordinator:

Jim Homann

Safety and Environmental Manager

1380 Front St.

Garner, IA 50438

Home 1-641-425-0994

Business 1-641-923-3711 Ext-44346

Cell 641-923-8033

Alternate Emergency Coordinators:

Bob Dodd

Facility Manager

206 Jerusalem St.

Klemme, IA. 50449

Home 1-641-587-2251



An Oshkosh Corporation Company

Iowa Mold Tooling Co., Inc.

500 Highway 18 West • P.O. Box 189 • Garner, IA 50438-0189 • P: (641) 923-3711 • F: (641) 923-6063

Business 1-641-923-3711 Ext-44603
Cell 641-923-8030

Ben Ebeling

Maintenance Lead

128 11th St. NE

Mason City, IA 50401

Cell 641-231-0115

Business 1-641-923-3711 Ext-44320

Emergency Equipment: 40 CFR 265.52 (e)

Water Sprinkler System:

Location:

The sprinkler system covers the entire main manufacturing facility including offices.

Physical Description:

The facility is divided into 10 zones. These zones are determined by the sprinkler coverage by the 7 sprinkler risers that feed the system, and the 3 zones covered by heat sensors.

Capabilities:

The sprinkler system is under 55 psi of pressure and is fed by the water tower located on site at IMT. Sprinkler heads are located throughout the facility including paint booths and paint kitchens.

Fire Extinguishers:

Location:

Approximately 154 Fire Extinguishers are located throughout all of IMT's buildings.

Physical Description:

Extinguishers rated for A B C fires.

Capabilities:

These extinguishers cover all of the fire hazards that may exist throughout the facility, excluding a magnesium belt at the shot blaster found at the south east corner of the main building.

Spill Control Equipment:

Location:

Spill Kits are located in both paint kitchens, the hazardous materials storage building and near receiving and oil storage areas in the main plant as well as the Used Truck and Ship out buildings.



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Physical Description:

The kits are a purchased yellow drum kit with a screw top.

Capabilities:

These kits contain materials that are designed for paints, solvents and oils that are stored in these areas. The absorbent pads and socks have the capability to soak up the material and the socks could also be used to contain a spill.

Communication Equipment

Location:

Telephones are available near the paint kitchens and just outside of the Hazardous Materials Storage room. Cell phones and 2 way radios are all available for use.

Physical Description:

The west paint kitchen telephone is located on the south wall outside of the kitchen.

The east paint kitchen telephone is located at the supervisor's desk, due south of the line.

The Hazardous Materials Storage Room telephone is located about 10' west of the main overhead entrance to the room.

The Maintenance Janitor, who is in charge of the room, carries a cell phone.

Capabilities:

These telephones are on the main phone system. In case of an emergency the caller can page for assistance, call the operator, when on duty and transfer information or call security and ask for assistance.

The two-way radio puts the user in contact with IMT security, the Safety Manager and the Facility Manager. Anyone of these contacts can make the call for emergency assistance and notify team members of an emergency.

Evacuation Plan: 40 CFR 265.52 (f)

Signals:

There is no alarm for detecting and alarming for a spill. Team members are instructed to use the paging system to page for assistance. Dial 19990 from any plant or office phone and page for assistance.

Should there be a fire in one of the paint kitchens from waste paint, a call will be made to the receptionist, the supervisor in charge or to the safety or maintenance departments and a request made for the fire department.

Should the fire become intense enough, the sprinkler system will be activated and the alarm will sound in the facility and at the local communications center.



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The alarm for a fire is a straight tone buzzer. Team members are instructed that when they hear a straight tone they are to go straight out the door, following the determined evacuation route or if necessary, use the safer alternate route.

Evacuation Routes and Alternate Evacuation Routes:

Evacuation routes are on display at several locations throughout the main plant and office and also in the ship out and used truck buildings. Training for evacuation is held annually with all team members and prior to initial assignment for new hires. Reference Appendix A.

Copies of the Contingency Plan: 40 CFR 265.53

A copy of this plan and any revisions to the plan will be maintained in the Safety Manager's office and submitted to all emergency agencies. Copies of the plan will be resubmitted to the emergency agencies whenever revisions are made.

Amendment of Contingency Plan: 40 CFR 265.54 (a–e)

This plan will be reviewed at least annually and whenever:

- (a) There is a change to regulations.
- (b) Should the plan fail in an emergency.
- (c) If this facility should change in its design construction, operation, maintenance, or other circumstances. It must be reviewed if any of the above-mentioned issues could increase the potential for fire, explosion or release of hazardous waste and there is a change in the way to respond to an emergency.
- (d) There is a change to the list of emergency coordinators.
- (e) There is a change to the list of emergency equipment.

Emergency Coordinator: 40 CFR 265.55

The listed Emergency Coordinators all live within a close proximity of the IMT facility. All of the personnel have been employed at IMT for over 10 years and have the capabilities and knowledge to locate records, understand the hazardous waste, are familiar with the facilities contingency plan, and have the authority to commit resources necessary to carry out the contingency plan.



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Emergency Procedures: 40 CFR 265.56 (a-j)

- (a) Whenever there is an imminent or actual emergency situation, the emergency coordinator, or his designee must immediately:
(In the event of a fire involving Hazardous Waste)
 - (1) Activate the fire alarm by going to the alarm box in the front office and throw the switch for the appropriate zone and call the communications center or have the receptionist do so.
 - (2) In the case of a dangerous hazardous waste spill an announcement will be made over the public address system with instruction for all team members.
 - (3) **Within 6 hours**, call local and state agencies (DNR Field Office) listed in this plan to determine the course of action for a cleanup and if necessary assistance with cleanup.
- (b) The emergency coordinator must immediately identify the material, the source, the amount and the extent of any released material. The material log can be consulted to determine the amount and the type of material in the hazardous material storage room.
- (c) The coordinator must assess the possible hazards to human health and the environment that may result from a release or fire. The assessment must consider the direct and indirect affects of the release, fire, or explosion. Toxic or irritating atmosphere, hazardous gases or a toxic runoff from fighting the fire may be produced.
- (d) If there is a release, fire, or explosion outside of the facility the coordinator must report his finding as follows:
 - (1) If evacuation is required the Police and Sheriff Departments must be notified and they must stay available to determine the extent of the evacuation.
 - (2) The coordinator must notify within 6 hours the DNR Field Office # 2 641-424-4073 or the National Response Center at 1-800-424-8802. The report must include:
 - (i) Name and Phone Number of the reporter.
 - (ii) Name and address of the facility.
 - (iii) Time and type of incident.
 - (iv) Name and quantity of material (s) involved.
 - (v) The extent of injuries if any.
 - (vi) The possible hazards to human health, or the environment, outside the facility.
- (e) The coordinator must take all reasonable measure to ensure that fires, explosions, and releases do not occur, reoccur, or spread to other hazardous materials at the facility. These measures must include stopping processes, collection and containing released waste, and removing or isolating containers.
- (f) IMT's operations do not include processes that contain the possibility of pressure and gas build up and the possibility rupturing valves and pipes.
- (g) Immediately after an emergency, the coordinator must provide for treating, storing and disposal of recovered waste, contaminated soil or surface water.
- (h) The coordinator must ensure that, in the affected areas of the facility:
 - (1) The wastes stored together are compatible.



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- (2) That all emergency equipment is cleaned and fit for its intended use **before operations resume.**
- (i) The owner operator must notify the Regional Administrator and the appropriate state and local authorities that the facility is in compliance with the requirements of paragraph (h) of this section before operations are resumed in the affected areas of the facility.
- (j) The owner or operator must note in the operating record the time, date, and details of the incident that required implementing the contingency plan. **A written report must be filed with the Regional Administrator within 15 days after the incident.** The report must include:
 - (1) Name, address, and telephone number of the owner or operator.
 - (2) Name, address, and telephone number of the facility.
 - (3) Date, time, and type of incident. (Fire, Explosion, or Release)
 - (4) Name and quantity of material (s) involved.
 - (5) The extent of injury, if any.
 - (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable.
 - (7) Estimated quantity and disposition of recovered materials that resulted from the incident

Personnel Training: 40 CFR 256.16 (a–i)

- (a) Authorized facility personnel responsible for transporting or cleaning up a hazardous waste spill will receive both class room and on the-job-training to teach them to perform their duties in a way that ensures the facilities compliance with the requirements of the program.
- (b) **Inspection:**
 - (1) Weekly inspections are conducted by the Maintenance Janitor, assignee, or the Safety and Environmental Manager on storage areas and spill kits.
 - (2) Repair and replace emergency and monitoring equipment.
 - (3) The Facility Manager is responsible for directing the work to repair or replace any emergency or monitoring equipment.
- (c) **Not Applicable** Key parameters for automatic waste feed cut-off systems.
- (d) **Communication and Alarm Systems:**
 - (1) Communication systems used at our facility include 2-way radios, paging system and mobile telephones.
 - (2) The alarm systems used at IMT would be the Fire Alarm for evacuation of the facility.
- (e) **Fire and Explosions:**
 - (1) Personnel are trained on the proper and safe procedures for handling a fire or explosion.
 - (2) Team members are trained on the proper use of fire extinguishers as well as the proper way to report a fire or explosion.
- (f) **Shutdown of Operations:**



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- (1) Personnel will be trained on the proper procedures for shutting down Natural and LP gas service as well as who to contact to shut down electrical service. Machine operators are instructed to e-stop their machines in the event of an emergency prior to exiting the building.
 - (2) Authorized personnel will be trained upon appointment to the position.
 - (3) Authorized personnel will take part in an annual review of the initial training.
 - (4) Documents must be maintained for verification.
- (g) **Documentation**
- (1) The job title will be named for the positions required.
 - (2) A job description for each position named will be maintained. It must include requisite skills, education, other qualifications, and duties.
 - (3) Included in the job description will be the amount and type of training for each authorized person.
 - (4) Records will be maintained to document the training provided for required skills and tasks.
 - (5) Training records must be kept on current personnel until the closure of the facility and for at least 3 years from the date the team member last worked at the facility.
- (h) The program is directed by the Safety and Environmental Manager. This is the person most familiar with the Contingency Plan and the hazardous waste management procedures.
- (i) Authorized facility personnel will be trained to effectively respond to emergencies and will become familiar with the emergency procedures, equipment, and emergency systems.

IOWA DNR Notification of Hazardous Conditions

Hazardous Condition:

This means any situation involving the actual, imminent or probable spillage, leakage, or release of a hazardous substance onto the land, into a water of the state or into the atmosphere which, becomes of the quantity, strength and toxicity of the hazardous substance, its mobility in the environment and its persistence, creates an immediate or potential danger to the public health and safety or to the environment.

Hazardous Substances:

The following are examples of substances which, in significant quantity, may be hazardous: acids; alkalis; explosives; fertilizers; heavy metals such as chromium, arsenic, mercury, lead and cadmium; industrial chemicals; paint thinners; paints; pesticides; petroleum products; poisons; radioactive materials; sledges; and organic solvents. "Hazardous substances" may include any hazardous waste identified or listed by the EPA.



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Reporting of Hazardous Conditions: 567-131.2(455B)

Any person manufacturing, storing, handling, transporting, or disposing of a hazardous substance shall notify the department at (641) 424-4073 (Jeff Vansteenburgh Field Office #2 Mason City) and the local police department or the sheriff of the affected county of the occurrence of a hazardous condition as soon as possible but not later than six (6) hours after the onset of the hazardous condition or discovery of the hazardous condition. A sheriff or police chief who has been notified of a hazardous condition shall immediately notify the department. Reports made shall be confirmed in writing.

Operational Spill:

An operational oil spill is a spill originating from a piece of machinery or equipment used in the operation of the business. This would include spills from the hydraulic or fuel systems of a forklift, mobile crane, and test equipment such as equipment being tested in the engineering lab area. If this type of spill occurs on the land and does not or does not have the potential to reach the waters of the state and is cleaned up promptly and properly, it does not have to be reported to the Iowa DNR. A written report must be filed with the Safety and Environmental Manager of IMT. If this type of oil spill has reached water of the state or has the potential to reach the waters of the state, **the DNR must be notified within six (6) hours of discovering the spill.**

Non Operational Spill:

A non-operational spill is one that originates for example, from storage or a vendor. All of these spills must be reported to **the Iowa DNR within six (6) hours of causing or discovering the spill.**

Management Notification:

If a spill does occur on IMT property (land) and reporting is determined to be required, the President of IMT or his designee must be notified immediately of the circumstances, the quantity, and the location of the spill. **It must also be communicated that a call must be made to the Iowa DNR within six (6) hours of discovery of the incident.**

Verbal Report: 131.2 (1)

The verbal report of such a hazardous condition should provide information on as many items listed in 131.2 as available data will allow.



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Written Report: 131.2 (2)

If a Hazardous Condition or Oil spill (Hazardous Condition) is reported within the required 6 hour time frame, a written report of such a hazardous condition shall be submitted to the department within 30 days and contain the following information:

- (a) The exact location of the hazardous condition.
- (b) The time and date of the onset or discovery of the hazardous condition.
- (c) The name of the material, the manufacturer's name and the volume of each material involved in the hazardous condition in addition to contaminants within the material if by themselves could cause a hazardous condition.
- (d) The medium (land water or air) in which the hazardous condition occurred or exists.
- (e) The name, address and telephone number of the party responsible for the hazardous condition.
- (f) The time and date of the verbal report to the department of the hazardous condition.
- (g) The weather conditions at the time of the hazardous condition onset or discovery.
- (h) The name, mailing address and telephone number of the person reporting the hazardous condition.
- (i) The name and telephone number of the person closest to the scene of the hazardous condition who can be contacted for further information and action.
- (j) Any other information, such as the circumstances leading to the hazardous condition, visible effects and containment measures taken that may assist in proper evaluation by the department.

Reporting of Subsequent Findings: 131.2(3)

All subsequent findings and laboratory results should be reported and submitted in writing to the department as soon as they become available.

Written Reports:

Written Reports should include the DNR spill number and be addressed to the duty officer responding to the spill. Reports can be sent via mail, fax, or electronic mail.

Hazardous Waste Disposal Information

All hazardous waste materials are sent to Rineco Chemical in Benton, Arkansas for fuels blending. Independent haulers, contracted by Rineco, provide transportation of manifested hazardous waste to the following facility:

Rineco Chemical
P.O. Box 729, 819 Vulcan Road
Benton, AR 72018
(800) 377-4692
(501) 778-9089
EPA ID #: ARD981057870



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Hazardous Secondary Recycled Materials Information

All hazardous waste materials are sent to Hydrite Chemical in Cottage Grove, Wisconsin for recycling. Hydrite fleet trucks provide transportation of manifested secondary hazardous materials to the following facility:

Hydrite Chemical
114 North Main Street
Cottage Grove, WI 53527
(608) 839-4571
EPA ID #: WID0000808824

Measures to Prevent the Escape of Hazardous Waste to the Environment

The hazardous waste storage area is located outside at the west side of the facility. Spill containment equipment and an over-pack drum are also stored within the area. Spill kits are inspected weekly to assure adequate spill control supplies are provided. Containers used for accumulation and storage of hazardous wastes are DOT-specification steel drums suitable for storage of the waste materials.

Secondary containment within the hazardous waste storage area is achieved by a concrete curb spanning the entire bottom of the storage shed.

Inspection of Hazardous Waste Storage Areas

Inspections of the hazardous waste and accumulation storage areas and containers are conducted and documented for the following items:

- Leaks
- Lids and bungs are in place
- Drums are properly marked
- Adequate aisle space is maintained
- Containment means provided and adequate

Security System: 40 CFR 112.20(h)(10)

During normal business hours, visitors to the facility are required to register at the main office and to be escorted while on company property. When the facility is not operating, buildings are kept locked to prevent unauthorized access.



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Release of Information

The Director of Human Resources for Iowa Mold Tooling, Inc. or his appointed designate shall have the sole responsibility for any release of information other than to emergency response agencies regarding Iowa Mold Tooling matters and activities. All team members shall refrain from releasing information related to Iowa Mold Tooling matters or activities, including what are in the Emergency Response Manual and this Contingency Plan. It is important that accurate and factual information be released to the public regarding Iowa Mold Tooling matters. Incorrect information could be detrimental to the operation of Iowa Mold Tooling, and the safety of Iowa Mold Tooling including our personnel and customers.

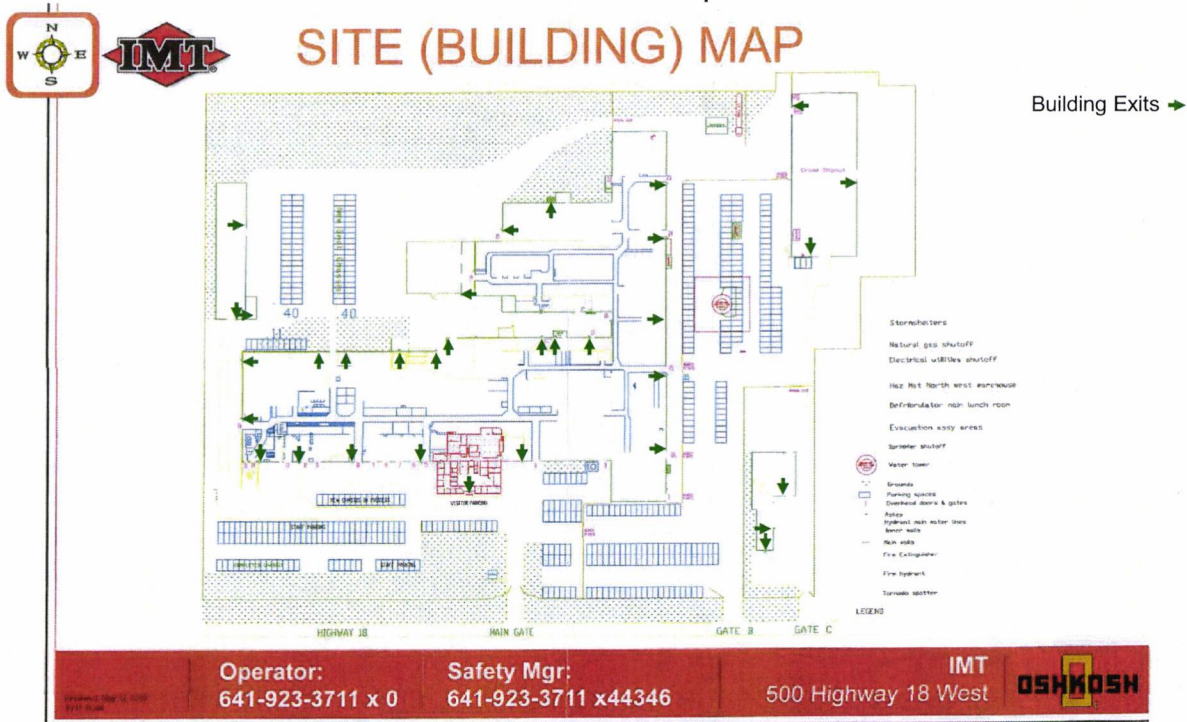


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Appendix A Evacuation Map



This map is maintained within the ERP Maps.

ATTACHMENT 6

Waste Multispec Profile - Updated

Rineco

819 Vulcan Road -- Haskell
P.O. Box 729, Benton, AR
Office (501) 778-9089 Fax (501) 776-2864
Attn: Rachael Billings

Account Rep: JOHN WOOLCOTT
Region: 905
Profile #: 1705-07445
Broker Profile ID:
Status: Approved -- Rineco Processing
Process: Liquids (TVL) (F)

Walk Through: No
Special Instructions: No
Create Date: 5/24/2017
Last Cert Date: 5/24/2017
Expiration Date: 5/24/2018

I. WASTE MATERIAL PROFILE SHEET

In accordance with the Federal and State regulations, it is necessary for the Generator of hazardous waste to properly identify the waste for their records as well as to supply the disposal facility with the information necessary to handle the waste. The information outlined below must be complete, and signed by the generator. PLEASE PRINT LEGIBLY OR TYPE.

Generator Name: **Iowa Mold Tooling - Oshkosh**

USEPA I.D. No. **IAD005286539**

Address: **500 Highway 18 West
Box 189**

State I.D. No.

Phone: **641-923-3711**

Garner, IA 50438

Fax: **641-923-4076**

Title:

Technical Contact: **Jim Homann**

24 hour Phone: **877-737-5277**

24 Hour Emergency Contact: **Rineco Emergency Service**

Is this material located or generated in a foreign country? No

Foreign Address:

II. GENERAL INFORMATION

Material Name: **Multispec & RC LT High Actives**

Source Code:

Yes A. Does waste exhibit the characteristic of ignitability as defined in 40 CFR 261.21?

Form Code: **W219**

No B. Does waste exhibit the characteristic of corrosivity as defined in 40 CFR 261.22?

No C. Does waste exhibit the characteristic of reactivity as defined in 40 CFR 261.23?

Yes D. Is waste a spent solvent as defined in 40 CFR 261.31?

No E. Is waste a discarded chemical product, off spec, container or spill residues as defined in 40 CFR 261.33?

Detailed description of process generating waste: **Solvent used to flush 2K2002, 8K264, 2K2002+8K264 from lines**

Anticipated Monthly Volume: **2**

Bulk: No Drum: Yes Other: No

Has Inner Containers: No

III. MATERIAL COMPOSITION

COMPONENT	CAS #	Concentration			PPM
		Min	Max	Actual	
<i>See Attachment for full list</i>					
Multispec Containing:		90.00	95.00		
2K2002 contains:					
Ethylene Glycol N-Butyl Ether 3.2%	111-76-2				
8K264 contains:					
N-Butyl Acetate 18.0%	123-86-4				
Hexane, 1,6-Diisocyanate-, Homopolymer	28182-81-2				
82.0%					
2K2002+8K264 (Two Part Catalyzed					
Hexane, 1,6-Diisocyanate-, Homopolymer	28182-81-2				
9.3%					
N-Butyl Acetate 2.1%	123-86-4				
Ethylene Glycol N-Butyl Ether 2.8%	111-76-2				
RC LT High Actives Solvent contains:		5.00	10.00		

IV. PHYSICAL CHARACTERISTICS

Physical State: **Liquid**
Free Liquid: **Yes**
Viscosity: **High**
Layers: **Single**
Odor: **Mild**
Flash Point: **< 73F**
BTU: **NA**
pH Level: **5.1 - 9.0**
Actual pH: **NA**
Density: **NA**

V. OTHER CHARACTERISTICS

No	Explosive	No	Dioxin
No	Radioactive	No	Shock Sensitive
No	Sulfide	No	PCB
No	Etiological	No	Cyanide
No	Pyrophoric	No	Water Reactive

VI. SHIPPING INFORMATION		Profile #: 1705-07445
DOT Hazardous Material: Yes ER Guide #: 128 Proper Shipping Name: Waste Flammable Liquids, N.O.S. (Contains N-Butyl Acetate)		
Hazard Class and Division: 3		UN or NA: UN1993 Packaging Group: II
RQ: Yes If Yes: D001 Addl. Info:		
UNIVERSAL WASTE: No USEPA HAZARDOUS WASTE: Yes		
Waste I.D. Numbers:	D001 D035 F003 F005	

VII. INDICATE IF THIS WASTE CONTAINS ANY OF THE FOLLOWING CHARACTERISTICS as defined by 40 CFR 261.24. Check only if waste exceeds regulatory threshold levels and include analytical data if available.

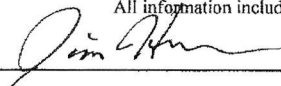
Constituent	Regulatory level PPM	TCLP PPM	Total PPM	Know ledge	Constituent	Regulatory level PPM	TCLP PPM	Total PPM	Know ledge
D004 Arsenic	5.0			No	D024 m-Cresol	200.0			No
D005 Barium	100.0			No	D025 p-Cresol	200.0			No
D006 Cadmium	1.0			No	D026 Cresol	200.0			No
D007 Chromium	5.0			No	D027 1,4-Dichlorobenzene	7.5			No
D008 Lead	5.0			No	D028 1,2-Dichloroethane	0.5			No
D009 Mercury	0.2			No	D029 1,1 Dichloroethylene	0.7			No
D010 Selenium	1.0			No	D030 2,4 Dinitrotoluene	0.13			No
D011 Silver	5.0			No	D031 Heptachlor	0.008			No
D012 Endrin	0.02			No	D032 Hexachlorobenzene	0.13			No
D013 Lindane	0.4			No	D033 Hexachlorobutadiene	0.5			No
D014 Methoxychlor	10.0			No	D034 Hexachloroethane	3.0			No
D015 Toxaphene	0.5			No	D035 Methyl Ethyl Ketone	200.0			Yes
D016 2,4 Dichlorophenoxyacetic acid	10.0			No	D036 Nitrobenzene	2.0			No
D017 2,4,5 TP Silvex	1.0			No	D037 Pentachlorophenol	100.0			No
D018 Benzene	0.5			No	D038 Pyridine	5.0			No
D019 Carbon Tetrachloride	0.5			No	D039 Tetrachloroethylene	0.7			No
D020 Chlordane	0.03			No	D040 Trichloroethylene	0.5			No
D021 Chlorobenzene	100.0			No	D041 2,4,5 Trichlorophenol	400.0			No
D022 Chloroform	6.0			No	D042 2,4,6 Trichlorophenol	2.0			No
D023 o-Cresol	200.0			No	D043 Vinyl Chloride	0.2			No

VIII. Benzene Waste and Pharmaceutical Manufacturing Operations NESHAP Generator Certification.

1. Is this waste generated by an industry with any of the following SIC Codes: 2911,2800-2899,3312 or 4953?	No
2. Does this stream have Benzene concentration of 10ppm or more?	No
3. Does this stream contain greater than 10% moisture?	No
4. Is this company's Total Annual Benzene (TAB) of 10Mg or greater per year?	No
5. Is benzene notice (subject to Subpart FF) required?	No
6. Is this waste water subject to 40 CFR part 63 Subpart GGG (Pharmaceutical Products)?	No

GENERATOR/BROKER (AUTHORIZED BY GENERATOR) : THIS CERTIFICATION IS REQUIRED FOR EACH CONFIDENTIAL PROFILE.

All information included in this document is true and accurate to the best of my knowledge.

Signature: <u></u>	Date: <u>6/1/17</u>
Print Name: <u>Jim Homann</u>	Title: <u>SAFETY TENURE MENTAL MGR</u>

Attachment	Full Profile Component Listing			Profile #1705-07445	
COMPONENT	CAS #	Minimum Concentration	Maximum Concentration	Actual Concentration	PPM
Multispec Containing:		90.00	95.00		
2K2002 contains:					
Ethylene Glycol N-Butyl Ether 3.2%	111-76-2				
8K264 contains:					
N-Butyl Acetate 18.0%	123-86-4				
Hexane, 1,6-Diisocyanate-, Homopolymer	28182-81-2				
82.0%					
2K2002+8K264 (Two Part Catalyzed Mixture 8:1) c					
Hexane, 1,6-Diisocyanate-, Homopolymer	28182-81-2				
9.3%					
N-Butyl Acetate 2.1%	123-86-4				
Ethylene Glycol N-Butyl Ether 2.8%	111-76-2				
RC LT High Actives Solvent contains:		5.00	10.00		
Naphtha (petroleum), Hydrotreated Light/Aliphatic	varies				
Light/Aliphatic Hdrycarbons 0-100%					
Toluene 0-100%	108-88-3				
Acetone 0-100%	67-64-1				
Isobutyl Alcohol 0-100%	78-83-1				
Solvent Naphtha (petroleum), light aromatic 0-100	64742-95-6				
Propylene Glycol Monomethyl Ether Acetate 0-10	108-65-6				
n-propyl acetate 0-100%	109-60-4				
Ethyl Alcohol 0-100%	64-17-5				
1-methoxy-2-propanol 0-100%	107-98-2				
methylethyl ketone 10-15%	78-93-3				